### **REMARKS**

This Reply is in response to the Office Action mailed on August 1, 2007 in which claims 1-8, 10, 12, 13, 15, 16, 22, 23, 26, 28-34, 36-38, 40, 41, 44, 45 and 51-68 were rejected. With this response, claims 3, 4, 13, 15, 22, 23, 40, 41, 44, 45, 47, 51 and 61 are canceled; claims 1, 8, 16 are amended; and claims 69-70 are added. Claims 1, 2, 5-8, 10, 12, 16, 26, 28-34, 36-38, 52 - 60 and 62-70 are presented for reconsideration and allowance.

I. Rejection of Claims 1-4, 26, 28, 29 and 62-68 under 35 USC 102(b) based upon Wen

Section 2 of the Office Action rejected claims 1-4, 26, 28, 29 and 62-68 under 35 USC 102(b) as being anticipated by Wen US Patent 6076917. Claims 3-4 are canceled. Claims 1-2, 26, 28, 29 and 62-68, as amended, overcoming rejection based upon Wen.

## A. Claim 1

Claims 1 is amended to incorporate the limitations of former dependent claim 4. Claim 1, as amended, recites a printing system which includes (1) a first set of print bar assemblies configured to transfer a first percentage of an imaging medium onto a first side of the print media, (2) a second set of print bar assemblies configured to transfer a second percentage of the imaging medium onto the first side of the print media and (3) at lease one other set of print more assemblies. Each individual set of print bar assemblies is configured to transfer a percentage of the imaging medium corresponding to the number of print bar assemblies sets. Claim 1 further recites that the first set of print bar assemblies, when stationary, collectively span a width of the print media.

Wen fails to disclose a printing system having at least three sets of print bar assemblies, wherein the first set of print bar assemblies, when stationary, collectively spans a width of the imaging medium. In contrast, at most, Wen merely discloses a print bar 31 and a narrow print head assembly 150. Thus, Wen only discloses, at most, two assemblies.

Moreover, nowhere does Wen disclose that the individual sets of print bar assemblies are configured to transfer a percentage of the imaging medium corresponding to the number of print bar assemblies sets. Wen is absolutely silent on this point. Accordingly, claim 1, amended to incorporate the limitations of former dependent claim to hope for, overcomes the rejection. Claims 4 and 62-67 depend from claim 1 and overcome the rejection for the same reasons.

#### B. Claim 26

Claim 26 recites a method which includes transferring a first percentage of an imaging medium onto a first side of the print media with a first printing unit and transferring a second percentage of the imaging medium onto the first side of the print media with a second print unit. The percentages of the imaging medium transferred onto the print media with the print units correspond to the number of print units.

Wen fails to disclose multiple print units which transfer percentages of imaging medium which correspond to the number of print units used to transfer the total amount of imaging medium. In rejecting claim 26, the Office Action asserts that Wen discloses this and simply refers to Figures 1 and 2 of Wen. However, neither Figure 1, Figure 2 nor any other portion of Wen discloses that the percentage of imaging medium applied by the bar 31 or print head assembly 150 corresponds to the number of such units. In other words, Wen does not disclose that print bar 31 and print head assembly 150 each transfer 50% of the imaging medium onto the print media. In fact, since print is sent assembly 150 merely meant to annotate the image printed by print bar 31, it is more than likely that print and assembling or hold 150 transfers a much smaller percentage of imaging material of the overall image as compared to print bar 31. The rejection of claims 28, 29 and 68, which depend from claim 26, should be withdrawn for the same reasons.

### C. Claim 28

Claim 29 depends from claim 26 further recites transferring at least one more percentage of the imaging medium with one or more print bar assemblies onto the print media with one or more print bar assemblies of at least one other print unit, a percentage of the imaging medium transferred onto the print media by a print in a corresponding to the number of print units.

Wen fails to disclose three print units. As noted above, Wen merely discloses the first of Print bar 31 second print head assembly 150. Moreover, Wen does not disclose that a percentage of imaging medium transferred onto the print media by opinion it corresponds to the number of units. Accordingly, the rejection of claim 29 should be withdrawn.

#### D. Claim 63

Claim 63 depends from claim 1 which recites a first set of print bar assemblies that, when stationary, collectively span a width of print media. Claim 63 further recites that the first set of print bar assemblies includes a plurality of print modules and a framework for supporting and aligning the plurality of print modules such that the plurality modules are connected as a single assembly.

Wen fails to disclose a first set of print bar assemblies that collectively span a width of media when stationary and that include a plurality of print modules and a framework for supporting and aligning the plurality of print modules such that the plurality modules are connected as a single assembly. In contrast, the only assembly of Wen that spans a width of media when stationary appears to be Print bar 31. However, nowhere does Wen ever disclose that print bar 31 includes a plurality of print modules and a framework for supporting and aligning the plurality of print modules such that the print modules are connected as a single assembly.

In rejecting claim 63, the Office Action refers to Figure 2 of Wen. However, Figure 2 does not illustrate Print bar 31 as including a plurality of print modules and a framework for supporting and aligning the plurality of print modules such that the print modules are connected

as a single assembly. Accordingly, he kept on this Action is failed to establish a prima facie case of anticipation. Thus, the rejection of claim 63 should be withdrawn. Claim 64-66 depend from claim 63 and overcome the rejection for the same reasons.

#### E. Claim 67

Claim 67 depends from claim 1 and recites that a first set of print bar assemblies transfers a chromatic color, a second set of print bar assemblies transfers the same dramatic color AND that the first print bar assembly and the second print bar assembly transfer substantially the same percentages of imaging medium onto the print media, the percentages corresponding to a number of print bar assembly sets in the printing system.

### F. Claim 68

Claim 60 depends from claim 26 and further recites a total amount of imaging medium is transferred onto a first side of the print media with a total number N of print units, wherein each print unit transfers a percentage of the imaging medium substantially equal to 100%/N.

Wen fails to even remotely disclose the limitations of claim 68. Nowhere does Wen disclose a total amount of imaging medium is transferred onto a first side of the print media with a total number N of print units, wherein each print unit transfers a percentage of the imaging medium substantially equal to 100%/N.

In rejecting claim 68, the Office action simply refers to Figures 1 and 2 of Wen. However, Figures 1 and 2 illustrate nothing regarding the limitations of claim 68. The Office Action has failed to establish a prima facie case of anticipation. Accordingly, the rejection should be withdrawn.

# II. <u>Rejection of Claims 5-8, 10, 12, 13, 15, 16, 22, 23, 30-34, 36-38, 40, 41, 44, 45, 47 and 52-61 under 35 USC 103(a) based upon Wen and Rezanka</u>

Paragraph 3 of the Office Action rejected claims 5-8, 10, 12, 13, 15, 16, 22, 23, 30-34, 36-38, 40, 41, 44, 45, 47 and 52-61 under 35 USC 103(a) as being unpatentable over Wen US Patent 6,076,917 in view of Rezanka U. S. Patent 5,570,118. Claims 13, 15, 22, 23, 40, 41, 44, 45, 47 and 61 are canceled Claims 5-8, 10, 12, 22, 23 and 52-60 depend from claim 1 and overcome the rejection for the same reasons discussed above with respect to claim 1. Claims 30-34, 36-38 depend from claim 26 and overcome the rejection based upon Wen and Rezanka for the same reasons discussed above with respect to claim 26. Rezanka fails to satisfy the deficiencies of Wen.

Claims 16 is rewritten in independent form to include all of the limitations of former base claim 13. Claim 60 depends from claim 1. Both claims 16 and 60 recite that at least one of the first set of print bar assemblies and a second set of bar assemblies is configured to transfer fixer to the medium.

Wen fails to disclose a print bar assembly configured to transfer fixer to the medium. Nowhere does Wen even mention the word "fixer." In rejecting such claims, the office Action bluntly refers to Figure 2 of Wen. Figure 2 illustrates nothing about the transference of a fixer to a medium. Rezanka does not satisfy this deficiency. Accordingly, the Office Action has failed to establish a prima facie case of obviousness with respect to claims 16 and 60. Thus, the rejection should be withdrawn.

# III. Rejection of Claim 51 under 35 USC 103(a) Based upon Wen and Rezanka

Section 4 of the Office Action rejected claim 51 under 35 USC 103(a) as being unpatentable over Wen US Patent 6076917 in view of Oota JP 02212146A. Claim 51 is cancelled, rendering the rejection moot.

# IV. Added Claims

With this response, claims 69 and 70 are added. Claims 69 and 70 correspond to former claims 63 and 67, respectively. Thus, no new matter is added.

As noted above with respect to the rejection of claim 63 and 67, Wen fails to disclose the limitations of such claims. Accordingly, claims 69 and 70 are also believed to be patently distinct over the prior art of record, including Wen. Thus, claims 69 and 70 are presented for consideration and allowance.

## VI. Conclusion

Upon entry of the amendments to the claims as set forth above, claims 1, 2, 5-8, 10, 12, 16, 26, 28-34, 36-38, 52 -60 and 62-70 are now pending in this application.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 08-2025. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 08-2025. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 08-2025.

Respectfully submitted,

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